

Lahontan Regional Water Quality Control Board

May 1, 2012

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EVALUATION OF PACIFIC GAS AND ELECTRIC COMPANY PROPOSED VOLUNTARY WHOLE HOUSE WATER PROGRAM IN RELATIONSHIP TO PROVISION 3.A. OF AMENDED CLEANUP AND ABATEMENT ORDER NO. R6V-2011-0005A1 (ORDER)

In your April 16, 2012 letter, Pacific Gas and Electric Company (PG&E) has requested that the Lahontan Water Board accept its voluntary whole house water program in lieu of implementing a quarterly evaluation of individual domestic wells to determine if detectable hexavalent chromium may be due to PG&E's discharge. If PG&E implements a voluntary program consistent with this letter, it will be in compliance with Provisions 2.e. (related to wells impacted at levels less than 3.1 µg/L hexavalent chromium or 3.2 µg/L total chromium), 3.a., and 3.b. of the Order. PG&E must, to be in compliance with Provision 1.a. of the Order, also provide interim replacement water to those households within the voluntary whole house water program area until such time as the voluntary whole house water program is implemented.

In evaluating this request, I am only considering the scope (area of coverage and eligibility criteria) of PG&E's voluntary whole house replacement water program. Until I review the details of PG&E's Feasibility Study (FS) submitted on April 9, 2012 and evaluate the public acceptability of the alternatives evaluated, I am neither accepting nor rejecting the method(s) by which PG&E will implement its voluntary program.

Provisions 1.a., 2.e., 3.a. and 3.b. of the Order require PG&E to provide interim and eventual whole house replacement water service to those domestic wells within one mile downgradient or cross-gradient of the quarterly plume boundaries where it is determined that hexavalent chromium levels in the well are due to PG&E's discharge. Provision 3.a. of the Order requires PG&E to develop and implement a method to evaluate if levels of hexavalent chromium between 0.06 µg/L and 3.1 µg/L in domestic or community wells within one mile of the plume are, more likely than not, partially or completely, due to PG&E's discharge.

PG&E's voluntary whole house replacement water program covers an area that is, at a minimum, equivalent to that required by the Order. Additionally, the voluntary program would include all domestic wells that could be determined to be "impacted" under Provision 3 of the Order. I am not ordering PG&E to implement its voluntary whole house replacement water program. However, I am acknowledging that, by implementing this voluntary program subject to the conditions listed below, PG&E will be in compliance with specific provisions of the Order.

PG&E is deemed in compliance with Provisions 1.a., 2.e. (both related to wells impacted at levels less than 3.1 µg/L hexavalent chromium or 3.2 µg/L total chromium), 3.a., and 3.b. of the Order if it does the following:

1. PG&E must, within five days of submitting a quarterly report, provide interim replacement water to those served by domestic or community wells within the "affected area" as defined in Finding 30 of the Order when quarterly samples indicate hexavalent chromium concentrations in that well at levels equal to or greater than 0.06 µg/L. PG&E must, within five days of receipt of this letter, implement interim replacement water for all domestic and community wells where existing sample results indicate the presence of hexavalent chromium at levels equal to or greater than 0.06 µg/L unless the results from the last four consecutive quarters are all less than 0.06 µg/L.
2. Once the FS is deemed acceptable, PG&E must, pursuant to the schedule in the Order or as formally amended, provide whole house replacement water to those served by domestic or community wells within the "affected area" as defined in Finding 30 of the Order when hexavalent chromium concentrations are detected in that well at levels equal to or greater than 0.06 µg/L unless the results from the last four consecutive quarters are all less than 0.06 µg/L.
3. PG&E must continue to provide replacement water (interim or whole house once the FS is deemed acceptable) to all those served by domestic or community wells within the affected area until all analysis of a well for the latest four consecutive quarters are below the detection limit of 0.06 µg/L (Provision 3.d. of the Order).
4. PG&E must, on a quarterly basis, modify the area within which it will implement both the interim replacement water and voluntary whole house replacement water program consistent with the determination of "affected area" in Finding 30 of the Order.
5. PG&E must submit reports to the Water Board consistent with Provisions 1.b, 1.d., 2.f. and 2.g. of the Order that include information on all properties within the "affected area" as defined in Finding 30 of the Order that are being provided interim or whole house replacement water, regardless if the replacement water is being provided pursuant to the Order or as part of PG&E's voluntary program.

If PG&E discontinues implementing its voluntary whole house replacement water program or fails to perform any of the five actions listed above, the Water Board will evaluate the conclusion that PG&E is in compliance with the specified Provisions of the Order described in this letter.

If you have any questions, please contact me at (530) 542-5412 or hsinger@waterboards.ca.gov.



Harold J. Singer
Executive Officer

c. Lahontan Water Board Members

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